

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

GWG Holdings, Inc., *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 22-90032 (MI)
)

) Jointly Administered
)

) **RE: Docket No. 268**
)

**CERTIFICATE OF COUNSEL WITH RESPECT TO THE APPLICATION TO
EMPLOY WILLKIE FARR & GALLAGHER LLP AS SPECIAL COUNSEL FOR THE
DEBTORS**

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel for the above-captioned debtors and debtors in possession (the “Debtors”) certifies as follows:

1. On May 11, 2022, the Debtors filed their *Application for Entry of an Order (I) Pursuant to Section 327(e) of the Bankruptcy Code Authorizing and Approving the Employment and Retention of Willkie Farr & Gallagher LLP as Special Counsel for the Debtors and Debtors in Possession, and (II) Granting Related Relief* [Docket No. 224] (the “Application”).

2. The deadline for parties to file objections to the relief requested in the Application was June 9, 2022 (the “Objection Deadline”). No objections to the relief requested in the Application were filed on the docket by the Objection Deadline. The Debtors received informal comments regarding the Application from the U.S. Trustee and the Official Bondholders’

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); and GWG Life USA, LLC (5538). The location of Debtor GWG Holdings, Inc.’s principal place of business and the Debtors’ service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors’ claims and noticing agent: <https://donlinrecano.com/gwg>.

Committee and periodically extended their respective deadline to object. All of their comments have been resolved by agreement as reflected in the attached revised proposed order.

3. The Debtors request that the Court enter the attached proposed order at its earliest convenience. A redline reflecting changes that have been made to the proposed order since the Application was filed is also attached.

Houston, Texas
June 21, 2022

/s/ Kristhy M. Peguero

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Certificate of Service

I certify that on June 21, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Kristhy M. Peguero

Kristhy M. Peguero